

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

TIFFANI M. SHAFFER,)	CIVIL DIVISION
)	
Plaintiff,)	No: 19-1481
)	
v.)	District Judge Christy Criswell Wiegand
)	
CRANBERRY TOWNSHIP,)	ELECTRONICALLY FILED
)	
Defendant.)	JURY TRIAL DEMANDED
)	

DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT

AND NOW, comes Defendant, CRANBERRY TOWNSHIP, by and through its attorneys, MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN, TERESA O. SIRIANNI, ESQUIRE and MORGAN M. J. RANDLE, ESQUIRE and files the within Motion for Summary Judgment, as follows:

1. Ms. Shaffer alleges that she was discriminated and retaliated against on the basis of her sex and pregnancy in violation of Title VII and the Pennsylvania Human Relations Act (“PHRA”) in the course of her employment as a patrol officer with Cranberry Township.
2. The Township respectfully moves for summary judgment on all of Ms. Shaffer’s claims in their entirety.
3. Discovery in this matter has closed and this Motion for Summary Judgment is ripe for disposition.
4. Ms. Shaffer’s discrimination claims fail to establish a prima facie case, and in any event, the Township has a legitimate non-discriminatory reason for Ms. Shaffer’s treatment that was not pretextual nor does it have any indicia of discriminatory animus.

5. Ms. Shaffer's retaliation claims similarly fail for lack of a prima facie case, and in any event, there was no retaliatory action taken against Ms. Shaffer.

6. The Township hereby incorporates its Brief in Support of Motion for Summary Judgment and Concise Statement of Material Facts as if fully set forth herein.

WHEREFORE, Defendant CRANBERRY TOWNSHIP, respectfully requests that this Honorable Court grant the within Motion for Summary Judgment and enter an order in accordance therewith.

Respectfully submitted,

**MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN**

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